

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

BRIERPATCH INVESTMENT LLC, as successor
in interest to Brierpatch Investment Limited
Partnership; GEORGE D. LEVY TRUST U/T/D
AUGUST 17, 1990, in its capacity as a member of
Brierpatch Investment LLC; KAREN S. LEVY
TRUST U/T/D DATED AUGUST 17, 1990, in its
capacity as a member of Brierpatch Investment
LLC; LISA M. LEVY 1987 TRUST U/T/D JUNE
17, 1987, in its capacity as a member of Brierpatch
Investment LLC; PAUL D. LEVY 1989 TRUST
U/T/D DECEMBER 21, 1989, in its capacity as a
member of Brierpatch Investment LLC; JOANNE
V. LEVY 1996 TRUST U/T/D MARCH 26, 1996,
in its capacity as a member of Brierpatch
Investment LLC; LEVY FAMILY 2002
IRREVOCABLE TRUST U/T/D MAY 13, 2002,
in its capacity as a member of Brierpatch
Investment LLC; ESTATE OF GEORGE D.
LEVY; KAREN S. LEVY, in her capacity as

Adv. Pro. No. 10-04402 (SMB)

Trustee for the George D. Levy Trust, the Karen S. Levy Trust, the Lisa M. Levy 1987 Trust, the Paul D. Levy 1989 Trust and the Joanne V. Levy 1996 Trust and in her capacity as Personal Representative of the Estate of George D. Levy; ROBERT C. FIRST, in his capacity as Trustee for the George D. Levy Trust, the Karen S. Levy Trust and the Levy Family 2002 Irrevocable Trust; DAVID R. ANDELMAN, in his capacity as Trustee for the George D. Levy Trust, the Karen S. Levy Trust and the Levy Family 2002 Irrevocable Trust; LISA L. SHAUB, individually and in her capacity as custodian for N.S. and G.S., Members of Brierpatch Investment LLC; PAUL D. LEVY, individually and in his capacity as custodian for J.L. and B.L., Members of Brierpatch Investment LLC; and JOANNE V. LEVY, individually and as a Member of Brierpatch Investment LLC,

Defendants.

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including December 10, 2014.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

[THIS PORTION IS INTENTIONALLY LEFT BLANK]

Dated: November 21, 2014
New York, New York

By: /s/ Nicholas J. Cremona
BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
Bernard L. Madoff*

Dated: November 21, 2014
New York, New York

By: /s/ LaShann M. DeArcy
MORRISON & FOERSTER LLP
1290 Avenue of the Americas
New York, New York 10104
Telephone: (212) 468-8042
Facsimile: (212) 468-7900
Gary S. Lee
Email: glee@mofo.com
LaShann M. DeArcy
Email: ldearcy@mofo.com
Kiersten A. Fletcher
Email: KFletcher@mofo.com

*Attorneys for Defendants Brierpatch Investment
LLC, George D. Levy Trust u/t/d August 17, 1990,
Karen S. Levy Trust u/t/d August 17, 1990, Lisa M.
Levy 1987 Trust u/t/d June 17, 1987, Paul D. Levy
1989 Trust u/t/d December 21, 1989, Joanne V.
Levy 1996 Trust u/t/d March 26, 1996, Levy Family
2002 Irrevocable Trust u/t/d May 13, 2002, Estate
of George D. Levy, Karen S. Levy, Robert C. First,
David R. Andelman, Lisa L. Shaub, Paul D. Levy
and Joanne V. Levy*

/s/ Jeffrey N. Rich

RICH MICHAELSON MAGLIFF MOSER, LLP

340 Madison Avenue, 19th Floor

New York, New York 10173

Telephone: (212) 220-9403

Facsimile: (212) 913-9641

Jeffrey N. Rich, Esq.

Email: jrich@r3mlaw.com

Mediator